

15-3-4  
Wally Baker



April 22, 2016

VIA EMAIL AND U.S. MAIL

Mary Nichols  
Chair, California Air Resources Board  
PO Box 2815  
Sacramento, CA 95812

**Re: Comments on ARB's Sustainable Freight Pathways Discussion Draft**

Dear Chair Nichols:

Jobs 1st Alliance would like to thank you for the opportunity to comment on the California Air Resources Board's (CARB) Sustainable Freight Pathways to Zero and Near-Zero Emissions Discussion Draft.

Jobs 1st Alliance partners with Union labor and local business. Our goal is to reduce poverty and increase job apprenticeship programs and life-long careers for the poor and homeless veterans.

While we share your goal of transforming the freight system to cleaner technologies, we are concerned about any proposals that may cause a decrease in cargo and could lead to a reduction in jobs. We therefore ask that CARB and other State agencies take the time to perform a comprehensive economic analysis of any freight system transformation to ensure that additional regulations will not result in decreasing economic growth and increasing impacts on public health.

This analysis of transforming the freight system to cleaner technologies must include its impact on the premature death rate of poor people and homeless veterans due to long-term unemployment. Los Angeles County has a poverty rate of 28%, and sadly, scientific research shows that unemployment kills more people prematurely than emissions. The 30,000 annual premature deaths in Los Angeles County alone beg for a close look at the economic impacts of new regulations on poor people and homeless veterans.

We believe that there are significant flaws with CARB's facility emissions cap concept. Any measure that cap or reduce cargo at the Ports is seemingly inconsistent with the economic goals stated in the discussion draft itself. Further, given the importance of the goods movement system to the state economy – especially to the



Southern California regional economy – and the fact that a declining cap regulation could seriously impact many of the critically important regional jobs provided for the poor and homeless veterans, any consideration of a declining cap warrants thorough economic analysis and careful consideration.

We look forward to working with CARB staff as it proceeds with the Sustainable Freight Strategy.

Sincerely,

A handwritten signature in cursive script, appearing to read "Wally Baker".

Wally Baker  
President  
Jobs 1<sup>st</sup> Alliance